

DH
DEVINE HAHN_{sc}

—ATTORNEYS AT LAW—

April 17, 2024

Kimberly Motley
Motley Legal
PO Box 1433
Matthews, NC 28106

Re: Lee, Jr., Michael A. v. Ambasan, Gina
Case No. 2:22-CV-00930

Dear Attorney Motley:

Gina Ambasan was a corrections officer at RCI, and as part of her job duties had to communicate with coworkers, staff, and supervisors about the status about inmates. Gina does not recall the names of any specific co-workers or supervisors due to length of time that has elapsed, and the high rate of turnover for workers in her unit. After a review of the investigation materials, it appears Officer Lauderdale was a supervisor at RCI while Gina was employed there.

Gina denies discussing her phone calls with Michael Lee with any of her coworkers, supervisors, and other in which she made her daily communications.

Gina discussed her phone calls, and other interactions with Investigators Joseph Soneberg, Latasha Lott, of the DOC, and Officer Brittany Weiss of the Racine County Sheriffs Department. While in discussions with the DOC investigators, Gina had employee representation provided by Pleshette Bueno. She discussed her interactions with Ms. Bueno to the extent she discussed them with the DOC investigators.

Ms. Ambasan also told her husband, Noli Ambasan, about the fact of the phone calls once the investigation had begun.

To the extent that the “interactions” this interrogatory refer to those alleged by the Plaintiff, the answer is no one.

Very truly yours,

DEVINE HAHN, S.C.

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TMD/dlr

cc: Gina Ambasan